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ADVISORY COUNCIL

SUBCOMMITTEE ON MANUAL OF PROCEDURES

Friday
November 4, 1977
1:30 P.M.

939 Ellis Street
San Francisco,
California

M I N U T E S

COMMITTEE MEMBERS PRESENT:	R. Robert Brattain, Joseph D. Coons, Lowell V. Smith, Hiram Wolch.
COMMITTEE MEMBERS ABSENT:	John L. Nicholson.
STAFF MEMBERS PRESENT:	Thomas Brennan, Milton Feldstein, Dario Levaggi, Wayman Siu, Silvia Escamilla.

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Chairperson Smith called the meeting to order at 1:45 P.M.

REVIEW OF MANUAL OF PROCEDURES

Chairperson Smith stated that it was the purpose of this Committee to review the Manual of Procedures and submit their recommendations to the Advisory Council. He inquired as to the Committee's time frame for the program, to which Mr. Feldstein responded that the Committee's program tied in with the recodification process of all of the regulations; that it was the Staff's feeling that the entire recodification would be submitted to the Advisory Council at one time; that some Committees are still receiving new drafts to be recodified.

Mr. Brattain in comments stated that some of the regulations which have been recodified will have to be reviewed again, such as Regulation 1.

On Inquiry of Chairperson Smith, Mr. Feldstein pointed out that five Subcommittees are presently working on the recodification as well as the Subcommittee on Regulation Consistency.

Mr. Feldstein pointed out that this was the first draft of the Manual of Procedures; that it is the result of input from each of the Divisions concerned with various parts of the regulations, and that it does not in any way represent a final report until the Advisory Council has reviewed it, and it is adopted by the Board of Directors; that a public hearing will be held on this matter.

On inquiry of Chairperson Smith as to how the Manual of Procedures was put together, Mr. Levaggi explained that the intent was to put in one book all of the procedures and methods relating to the regulations; that efforts were made to cover all the regulations in this manual, but that some may be missing; that no attempt was made to include in this Manual the Administrative Procedures and Policies of the District; that it only contains approaches required in the regulations for determining compliances.

Mr. Feldstein explained that when this Manual of Procedures is finished and is adopted by the Board of Directors, it will be primarily used by those people who are being regulated; that it will indicate to them whether or not they are in compliance with the District's regulations; that it has been agreed that this book shall be called Manual of Procedures, and that it will be part of the regulations.

Mr. Brattain inquired if Staff included in this Manual those drafts recently referred to them as result of the recodification process, to which Mr. Levaggi replied in the affirmative.

Dr. Wolch pointed out that to the User the concept of this Manual is that it indicates to industry, governmental agencies, public agencies and the general public source test procedures. He stated that he felt this Manual should be published and be made available to all persons interested in buying it.

There was discussion as to how this Manual would be best written so that not only governmental agencies requiring technical procedures could use it but that the general public could be able to read it and understand it as well. Mr. Brattain stated that it was the intent of the District to put out an accurately defined technical procedures manual regardless of who the User is. Mr. Coons in comments stated that this Manual could be published and be made available to the general public for purchase, but that the District should not be concerned if it is not understood by everyone who reads it.

On inquiry of Chairperson Smith as to the Districts past methods with respect to Procedures, Mr. Feldstein replied that Procedures has always been a part of the District's regulation structure.

On inquiry from Chairperson Smith as to which of the Regulations the Manual of Procedures applied, and as to how the District measures emissions, Mr. Feldstein explained that a source first determines which regulation applies to his application; that this is outlined in the regulations; that he determines how to measure emissions by referring to the Manual of Procedures.

There was discussion as to the method the Committee would follow in reviewing the Manual, Dr. Wolch pointing out that the large aspect of contents should be considered, that he felt the Manual of Procedures was too large and could be reduced in size by referring to the Federal Register for methods. He stated that it would be easier if the person interested in any particular method could obtain the information he needs item by item instead of getting a large manual with material not applicable to his operation.

Mr. Brattain stated that it is necessary to publish a Manual that is complete so that the User does not have to refer to other sources. It was pointed out that some methods are changed from year to year and that it would be better if the source interested in the changes could contact the District. Mr. Coons stated that the procedures are just as legal as the regulations and that it requires action by the Board of Directors to change any of them.

Mr. Feldstein pointed out that when this Manual of Procedures is finally adopted by the Board of Directors, it will become part of the State Implementation Plan and as such will have to be approved by EPA; that if EPA finds that some of the procedures are not adequate they will let us know. He stated that the Manual contains complete analytical procedures developed by the District; and that it was the only one of its kind in the State.

After discussion, the Committee agreed that industry should be advised in advance the particular method to be discussed by the Committee at its meeting, so that they could have a qualified person present to comment on the methods being discussed. Chairperson Smith stated that the kind of input received from industry would be of technical nature and that it would be of value to the Committee in its efforts to edit an effective Manual. It was decided that any substantive changes would not be made until the Advisory Council was notified.

Mr. Feldstein suggested that industry be asked to send in their comments on the Manual or in any particular area where it feels there are problems. The Committee so agreed requesting that industry send them directly to the Advisory Council as soon as possible so that Staff would have time to evaluate them prior to the next meeting.

On suggestion of Mr. Coons, the Committee agreed that if EPA's procedures are used in the Manual that it will be so specified.

It was decided that the Committee would start their review with Sulfur and that Staff would provide a format of sections for discussion at further meetings.

The following deletions were made:

Page 8, 2.2 last paragraph;
Page 9,
Page 10, first paragraph to read:

2.3. Daylight observations should be made with the observer facing away from the sun within an angle of about 70° within the line of site (See Fig. 2).

Page 11, first paragraph and last paragraph under item 4.
Page 12, first paragraph and last paragraph under item 5.3.
Page 13, the words "Ringelmann 5 (obscuration) deleted.
Pages 15, 16 and 17 deleted.

TIME AND PLACE OF NEXT MEETING

1:30 P.M., December 2, 1977, 939 Ellis Street, San Francisco, CA.

The meeting adjourned at 3:00 P.M.

Respectfully submitted,

Silvia Escamilla
Minutes Clerk

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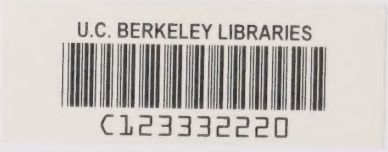

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